



October 15, 2008

Re: Request for Comments on the Renewable Portfolio Standard (RPS) under MGL Chapter 25A, Section 11F

Dear Sir/Madam:

FirstLight Power Enterprises, Inc. ("FirstLight") is pleased to present these written comments to the Massachusetts Department of Energy Resources ("DOER") pursuant to the DOER's informal fact-gathering process that allows for stakeholder comment on the Renewable Portfolio Standard ("RPS") issues raised in the Green Communities Act G.L. Chapter 25A, Section 11F

FirstLight is headquartered in Hartford, Connecticut and is the owner, operator, or manager of nearly 2,200 megawatts (MW) of electric generating assets, including over 1,200 MW in Massachusetts, the majority of which is hydroelectric power. Our company was pleased to see the Green Communities Act signed into law, particularly because, for the first time, incremental additions to hydroelectric capacity will produce energy that qualifies for compliance with the Massachusetts RPS requirements.

We would like to associate ourselves with the comments submitted by the Bay State Hydropower Association and the New England Power Generators Association, both of which we are a member. We also would like to add the following suggestion on a methodology that could be used in determining the amount of incremental hydropower that would qualify as a Class I renewable resource.

Determining Incremental Hydropower

FirstLight would like the DOER to note that another agency in the Commonwealth has already approved a calculation of incremental upgrades made at one of our hydroelectric facilities. Incremental upgrades made at FirstLight's six-unit hydroelectric generating Cabot Station in Montague, Massachusetts have resulted in an increase of 17% more installed capacity and energy from the same amount of water, an amount approved by the Massachusetts Department of Environmental Protection (DEP). A verification of this upgrade was made as part of the DEP's acceptance of our application for Public Benefit Set Aside Allowances (BWP AQ 26) in August 2008 which included supporting information for the efficiency upgrades made at the station.

FirstLight suggests that the DOER could adopt a similar process as the DEP when determining the amount of incremental generation that qualifies as a Class I renewable resource. Adopting such a process would allow for a swifter implementation of the RPS regulations by January 1, 2009 and would be familiar to many facilities that already apply for the Public Benefit Set Aside Allowances.

Thank you for the opportunity to provide our comments. If you have any questions on these comments, please contact me at (860) 895-6918 or JGinnetti@firstlightpower.com.

Sincerely,

A handwritten signature in black ink that reads "James A. Ginnetti". The signature is written in a cursive style with a large, stylized "J" and "G".

James A. Ginnetti
Vice President – External Affairs